

Electricity Authority
By email: submissions@ea.govt.nz

8 August 2025

Consultation Paper – 13 and 14 December 2018 under-frequency events

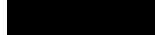
Mercury appreciates the opportunity to comment on the Electricity Authority's Consultation Paper to determine causes of the 13 and 14 December 2018 under-frequency events.

Our responses to the Authority's questions are set out in the Appendix.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Bright".

John Bright
Regulatory Strategist



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Q1	Do you agree with the Authority's draft determination that Genesis, as a generator, was the causer of the 13 December 2018 UFE? If not, please state your alternative view on the causer and give your reasons.	Yes, we agree with the Authority's draft determination.
Q2	Do you agree with the Authority's draft determination that Transpower, as the grid owner, was the causer of the 14 December 2018 UFE? If not, please state your alternative view on the causer and give your reasons.	<p>Both the Authority and Transpower agree that the grid owner was the only potential causer of the event, a conclusion Mercury supports. In determining the causer, the key issue is whether the under-frequency event ("UFE") would have occurred without the planned maintenance.</p> <p>If it is unambiguous the lightning strike alone would have caused the UFE then we agree with Transpower there was no causer, provided the protection equipment operated as normal. However, if there is a chance the lightning strike only caused the UFE because maintenance was occurring, Transpower's operational decision to proceed with that maintenance despite the known risk of thunderstorms must at minimum have contributed to the UFE.</p> <p>Mercury does not have enough information to suggest whether the lightning strike alone would have caused the UFE but suggests the Authority considers this further.</p>
Q3	Do you agree with the system operator's calculation that, for the purposes of calculating the UFE charge, 200.1 MW was lost at the grid injection point for Huntly Unit 5 as a result of the 13 December 2018 UFE? If not, please state your alternative view on the MW lost and give your reasons.	<p>Yes.</p> <p>We accept the calculation as reasonable as we do not retain sixty second generation data from other participants.</p>
Q4	Do you agree with the system operator's calculation that, for the purposes of calculating the UFE charge, 240.7 MW was lost at the grid injection point for Huntly Unit 4 as a result of the 14 December 2018 UFE? If not, please state your alternative view on the MW lost and give your reasons.	Yes – as for Q3.